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IN AND BEFORE THE  
2006 SEP 25 P 4: 06  
FEDERAL ELECTION COMMISSION

In re:

Santorum 2006 and  
Gregg Melinson, treasurer  
in his official capacity as  
treasurer of Santorum 2006  
and Rick Santorum

MUR 5788

RESPONSE AND OBJECTIONS TO  
COMPLAINT

2006 SEP 25 P 4: 46

FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Santorum 2006, the principal authorized campaign committee of Rick Santorum, Republican nominee for the United States Senate from Pennsylvania, Gregg Melinson in his official capacity as Treasurer of the Committee and Rick Santorum, Republican candidate for the United States Senate from Pennsylvania (collectively hereafter "Santorum Respondents"), hereby file this Response and Objection(s) to the Complaint filed with the Federal Election Commission ("Commission") in the above-referenced Matter Under Review # 5788.

Santorum Respondents have committed no violation of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Complaint, accordingly, should be dismissed.

The Complaint alleges that Santorum Respondents have violated the Act by virtue of a certain mailing ("the mailing") by the Republican Federal Committee of Pennsylvania. The Complaint is factually erroneous in the following respects:

1. The Republican Federal Committee of Pennsylvania is a qualified political party committee duly registered with and recognized by the Federal Election Commission pursuant to 2 U.S.C. § 441(A)(4).

2. The Republican Federal Committee of Pennsylvania's FEC Committee Identification number is C00044842.

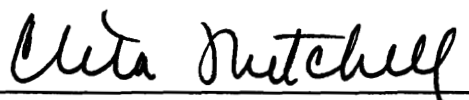
3. The mailing was a non-allocable volunteer mailing paid for by the Republican Federal Committee of Pennsylvania pursuant to 11 C.F.R. §100.147. Such a mailing is not an expenditure as defined in the Act and is not subject to reporting requirements. See 11 C.F.R. §100.147(e). See also Response of the Republican Federal Committee of Pennsylvania, an additional named Respondent in this MUR. The Santorum Respondents adopt in its entirety the Response filed by the Republican Federal Committee of Pennsylvania and incorporate its contents in this Response.

4. Neither the Santorum Respondents nor the Republican Federal Committee of Pennsylvania have violated any provision of the Act with respect to the referenced mailing.

**CONCLUSION**

For the reasons stated above and because neither the facts nor the law support further proceedings with respect to the Complaint, and because Respondents have committed no violation of the Act, Santorum Respondents respectfully move the Commission to dismiss the MUR and for such other necessary relief as deemed appropriate by the Commission.

Respectfully Submitted,



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Gregg Melinson in his official  
capacity as Treasurer of Santorum 2006;  
and Rick Santorum

Submitted via hand delivery this 25th day of September, 2006

Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Attention Jeff Jordan, Esq., Supervisory Attorney  
Complaints Examination and Legal Administration